

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

CONGHUA YAN,

Plaintiff,

v.

CIVIL ACTION NO. 4:23-cv-00758-P-BJ

THE STATE BAR OF TEXAS, a private company,

THE BARROWS FIRM, a private company, LESLIE STARR BARROWS, in individual capacity, as member of the State Bar of Texas,

WILLIAM ALBERT PIGG in individual capacity, as member of the State Bar of Texas,

SAMANTHA YBARRA, in individual capacity, as member of the State Bar of Texas,

LUIS JESUS MARIN, in individual capacity, as member of the State Bar of Texas, and official capacity as Assistant Disciplinary Counsel for the Office of the CDC,

DANIEL EULALIO MARTINEZ, in individual capacity, as member of the State Bar of Texas, and official capacity as Assistant Disciplinary Counsel for the Office of the CDC,

RACHEL ANN CRAIG, in individual capacity, as member of the State Bar of Texas, and official capacity as Associated Judge,

TARRANT COUNTY,

Defendants.

**DEFENDANT SAMANTHA YBARRA'S AMENDED UNOPPOSED MOTION FOR
EXTENSION OF DEADLINE TO RESPOND TO PLAINTIFF'S SECOND AMENDED
COMPLAINT**

Defendant Samantha Ybarra (“Ybarra”) files this Amended Unopposed Motion for Extension of Deadline to Respond to Plaintiff’s Second Amended Complaint and respectfully request that the Court extend the deadline for her to answer or otherwise respond to Plaintiff’s Second Amended Complaint [Dkt. 48] until September 25, 2023, and in support thereof states as follows:

1. Plaintiff filed his Original Complaint on July 21, 2023. *See* Dkt. 1.
2. Ybarra was not served until August 24, 2023. *See* Dkt. 29.
3. Plaintiff filed his Second Amended Complaint on September 8, 2023. *See* Dkt. 48.
4. On September 11, 2023, Ybarra’s counsel emailed Pro Se Plaintiff at the email address provided on the Court’s docket requesting an extension from Plaintiff to file a response to Plaintiff’s Second Amended Complaint.
5. Plaintiff is unopposed to Ybarra’s request for extension of time.
6. Thus, Ybarra respectfully requests that the Court grant her an extension of time to file an answer or otherwise respond to Plaintiff’s Second Amended Complaint until September 25, 2023.

WHEREFORE Ybarra respectfully requests that the Court grant this Amended Unopposed Motion for Extension of Deadline to Respond to Plaintiff’s Second Amended Complaint and enter her proposed order extending the deadline for her answer or otherwise respond to Plaintiff’s Second Amended Complaint until and including September 25, 2023, and for such other and further relief to which Ybarra may be justly entitled.

DATED: September 12, 2023.

Respectfully submitted,

/s/ Roland K. Johnson

Roland K. Johnson
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**ATTORNEYS FOR DEFENDANT
SAMANTHA YBARRA**

CERTIFICATE OF CONFERENCE

I certify that I have conferred with Pro Se Plaintiff, and Plaintiff is not opposed to the extension requested herein.

/s/ Caroline M. Cyrier

Caroline M. Cyrier

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2023, a true and correct copy of Defendant Samantha Ybarra's Motion for Extension of Deadline to Respond to Plaintiff's Second Amended Complaint was served on all counsel of record and parties not represented by counsel, via ECF.

/s/ Caroline M. Cyrier

Caroline M. Cyrier